

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

NOTICE OF REMOVAL

Come Defendants G.F. Enterprise II, LLC d/b/a Taco Bell and G.F. Enterprise IV, LLC d/b/a Taco Bell, by and through counsel, and give notice of their removal of this case to this Court. In support of their Notice of Removal, Defendants assert as follows:

1. On September 3, 2020, Plaintiff filed a Complaint in the Circuit Court of Tennessee for the Twentieth Judicial District at Nashville, Davidson County, Docket No. 20C1941, against the above-named Defendants. The complaint did not specify a monetary ad damnum.

2. On November 23, 2020, Plaintiff filed an Amended Complaint in which Plaintiff specified in his prayer for relief an ad damnum in the amount of \$300,000.00

3 Copies of the complete state court file are attached hereto as Collective Exhibit 1. These documents are all the processes, pleadings and orders filed with Davidson County Circuit Court to date.

4 Plaintiff was at the time of the commencement of said action and still is a citizen
and resident of the state of Tennessee and of no other state

4 Defendant G.F. Enterprise II, LLC d/b/a Taco Bell was at the time of the commencement of said action and still is a corporation organized under the laws of the state of Delaware and of no other state, with its principal place of business in Florida.

6 Defendant G.F. Enterprise IV, LLC d/b/a Taco Bell was at the time of the commencement of said action and still is a corporation organized under the laws of the state of Delaware and of no other state, with its principal place of business in Florida.

7 In Plaintiff's prayer for relief, he seeks damages of \$300,000.00. As a result, the amount in controversy exceeds the sum or value of \$75,000.00. Since the amount in controversy exceeds the sum or value of \$75,000.00, is wholly between the citizens of different states, and is within the jurisdiction of this Court pursuant to the provisions of Title 28 United States Code § 1332, it is removable to this Court pursuant to the provisions of Title 28 United States Code § 1441.

WHEREFORE, Defendants pray that this Court accepts this Notice and proceeds with the action heretofore referred to in accordance with law.

Submitted this the 23rd day of December, 2020.

Respectfully submitted,

**LEITNER, WILLIAMS, DOOLEY
& NAPOLITAN, PLLC**

By: /s/ Thomas J. Dement II
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Attorney for Defendants

CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that the foregoing document has been served upon all counsel of record for the parties at interest in this cause by electronic notification through the Court's CM/ECF System, U.S. mail, and/or email to:

John H. McElheny, Esq.
3626 Clairmont Ave. South
Birmingham, AL 35222
sbalzli@asilpc.com
jmcelheny@asilpc.com

this the 23rd day of December, 2020.

By: /s/ Thomas J. Dement II
Thomas J. Dement II